

LAW OFFICES OF CONSTANTINE BARDIS, LLC  
1800 MAIN STREET  
LAKE COMO, NJ 07719  
TEL: 732-280-2500  
FAX: 732-280-1991  
Attorney for Secured Creditor,  
Michael S. Tsontakis

UNITED STATES BANKRUPTCY COURT  
District of New Jersey

In Re: : CHAPTER 7 CASE NO:05-20980-KCF  
: As to debtor Robert and Cynthia  
: Bodtmann:  
Robert J. Bodtmann :  
S.S. 147-66-4738 : JUDGE: Hon.Kathryn C. Ferguson  
: :  
: Debtor, : **NOTICE OF MOTION AND**  
: : **HEARING**  
Cynthia M. Bodtmann, wife :  
S.S. 140-76-4663 :  
: Co-Debtor, :  
: :  
: :  
: :

TO THE DEBTORS, ALL CREDITORS AND OTHER PARTIES IN INTEREST:

**YOU ARE HEREBY NOTIFIED** that on the 31<sup>st</sup> day of May 2005, at 10:00 o'clock A.M. in the 3<sup>rd</sup> Floor, Court Room No. 2, of the United States Bankruptcy Court, District of New Jersey, at 402 East State Street, Trenton, NJ 08608, there will be a hearing regarding the Motion of Michael S. Tsontakis, Secured Creditor for Relief From the Automatic Stay and Prospective Relief under Section 362 of the Bankruptcy Code.

If not required to be attached, a set of the moving papers will be provided upon request by the undersigned or may be inspected at the office of the Clerk.

Any opposition or other response to the motion must be served upon the undersigned and the original and one copy of such papers with proof of service must be filed with the Clerk of the United States Bankruptcy Court at East State Street, Trenton, New Jersey, NOT LATER THAN SEVEN (7) DAYS BEFORE THE HEARING DATE.

Dated: May 9, 2005

/s/ Constantine Bardis

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CONSTANTINE BARDIS, ESQ.  
Attorney for Creditor  
Michael S. Tsontakis

#### **CERTIFICATION OF SERVICE**

I, Constantine Bardis, of full age hereby certify:

1. I am an attorney at law in the State of New Jersey and counsel for secured creditor Michael S. Tsontakis, and at all times hereinafter mentioned was, more than 18 years of age.

2. On April 28, 2005, I caused to be served a true copy of the within Notice of Motion, Certification of Service, Certification in support motion, and proposed form of Order by way of electronic filing, upon the Clerk for the United States Bankruptcy Court, 402 East State Street, Trenton, NJ 08736.

3. On April 28, 2005, I caused to be served a true copy of the within Notice of Motion, Certification of Service, Certification in support motion, and proposed form of Order by way of regular mail, upon debtors Robert J. and Cynthia M. Bodtmann, husband and wife, P.O. Box 162, Avon, NJ 07717.

4. On April 28, 2005, I caused to be served a true copy of the within Notice of Motion, Certification of Service, Certification in support motion, and proposed form of Order by way of regular mail, upon the trustee in this matter,

Thomas Orr, Law Offices of Thomas J. Orr, 321 High Street,  
Burlington, NJ 08016-4496.

LAW OFFICES OF  
CONSTANTINE BARDIS, LLC.

/s/ Constantine Bardis

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CONSTANTINE BARDIS, ESQ.  
Attorney for Creditor  
Michael S. Tsontakis

Dated: May 9, 2005